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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DR. F. VICTOR RUECKL, an individual,  
  
Plaintiff,

v.

INMODE LTD., a foreign limited liability  
corporation; DOES 1 – 10, INCLUSIVE; AND  
ROE CORPORATIONS 11-20, INCLUSIVE,  
  
Defendants.

CASE NO. 2:19-cv-02186-KJD-NJK

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND TIME TO FILE  
AMENDED COMPLAINT**

**[FIRST REQUEST]**

Plaintiff Dr. F. Victor Rueckl ("Dr. Rueckl"), by and through his attorneys, LIPSON NEILSON P.C., and Defendant InMode, Ltd. (hereinafter "InMode"), by and through its attorneys, RUSHFORTH LEE & KEIFER LLP, hereby stipulate to continue Plaintiff's deadline to file his Amended Complaint:

**STIPULATION**

1. On July 27, 2020, this Court issued an Order granting in part and denying in part InMode's Motion to Dismiss [Dkt. No. 44] (the "Order").

2. The Order provided that Dr. Rueckl may file an amended complaint within 14 days of the entry of the Order.

3. Pursuant to the deadline set forth in the Order, Dr. Rueckl's Amended Complaint is presently due by August 10, 2020.

1           4.     Dr. Rueckl needs additional time to verify factual allegations pertinent to  
2 his forthcoming Amended Complaint.

3           5.     Dr. Rueckl respectfully requests an extension up to and until **August 17,**  
4 **2020** to file his Amended Complaint.

5           6.     Plaintiff's counsel has conferred with Defendant's counsel regarding this  
6 Stipulation and both parties agree to the extension.

7           7.     The parties further stipulate that InMode shall have three weeks from the  
8 date of the filing of the Amended Complaint to respond to the same, and that no further  
9 response to the original Complaint is required.

10          8.     This Stipulation is made in good faith and not for any dilatory or other  
11 improper purpose. Defendant will not suffer any prejudice if the Court permits Plaintiff  
12 the requested extension. Defendant has consented to the extension.

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9. This is the first request for an extension of time for Plaintiff to file his Amended Complaint.

LIPSON NEILSON P.C.

RUSHFORTH LEE & KIEFER LLP

/s/ Jonathan K. Wong

/s/ Matthew W. Park

By: \_\_\_\_\_

By: \_\_\_\_\_

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*Attorneys for Defendant InMode, Ltd.*

*Attorneys for Plaintiff Dr. F. Victor Rueckl*

**ORDER**

**IT IS SO ORDERED.**

\_\_\_\_\_  
United States Magistrate Judge

DATED: August 10, 2020

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